

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re:	)	Chapter 11
	)	Case No. 09-35697
My Ranch, Inc.	)	
d/b/a Fresh Harvest Market	)	
	)	Judge Schmetterer
Debtor and Debtor in Possession	)	
_____	)	
	)	Chapter 11
Cecilia N. Johnson	)	Case No. 09-37011
	)	
Debtor and Debtor in Possession	)	Hearing: February , 2010 at 10:00 a.m.

**NOTICE OF MOTION**

To: See attached service list

PLEASE TAKE NOTICE that I will appear on February 23, 2010 at 10:00 a.m. before the Honorable Jack B. Schmetterer, or any other Judge sitting in his stead, in Courtroom 682, Dirksen Federal Building, 219 S. Dearborn St., Chicago, IL, and will then and there present the **Debtors' Motion to Continue Debtor's Motion to Extend the Deadline to File Objections to Proofs of Claim**, and request entry of orders in accordance with the motion. AT WHICH TIME AND PLACE YOU MAY APPEAR AND BE HEARD.

/s/ Forrest L. Ingram  
One of Debtor's attorneys

Forrest L. Ingram, P.C.  
Forrest L. Ingram #3129032  
79 W. Monroe St., Suite 900  
Chicago, IL 60603  
(312) 759-2838

**CERTIFICATE OF SERVICE**

I, Philip Groben, an attorney, certify that I caused a true and correct copy of the above and foregoing Notice and the document to which it refers, on all parties entitled to service, by electronic filing through ECF, or by regular U.S. mail, as set forth on the attached service list, on February 16, 2010.

/s/ Philip Groben

**SERVICE LIST**

**Via CM/ECF**

**US Trustee**

William T. Neary  
Office of the United States Trustee  
Northern District of Illinois  
219 S. Dearborn St., Room 873  
Chicago, IL 60604

**National City Commercial Capital  
Company, LLC**  
**Vincent T Borst**  
Borst & Collins, LLC  
180 N Stetson Ave Suite 3050  
Chicago, IL 60601

**Huntington National Bank**  
**Monette W Cope**  
Weltman Weinberg & Reis Co LPA  
180 North LaSalle St Ste 2400  
Chicago, IL 60601

**Illinois Department Of Revenue**  
**Faith Dolgin**  
Illinois Attorney General  
100 W Randolph St 13th Floor  
Chicago, IL 60601

**Fifth Third Bank**  
**David L Hazan**  
Diver, Grach, Quade & Masini LLP  
111 North County Street  
Waukegan, IL 60085

**Coactiv Capital Partners, Inc.**  
**David P. Vallas**  
Wildman Harrold Allen & Dixon  
225 West Wacker Drive  
Chicago, IL 60606

**Via U.S. Mail**

**Debtor**

My Ranch, Inc.  
4650 N. Sheridan Rd.  
Chicago, IL 60640

Bank of America  
P.O. Box 17054  
Wilmington, DE 19884

Bank of the West  
c/o Kennet Donke  
7220 W. 194th St. Suite 105  
Tinley Park, IL 60487

Charter One Bank  
1215 Superior Avenue  
Cleveland, OH 44114

Charter One Bank  
PO Box 18204  
Bridgeport, CT 06601-3204

Citizens Leasing  
328 S. Saginaw Street  
Flint, MI 48502

Fifth Third Bank  
Business Mastercard  
P.O. Box 740789  
Cincinnati, OH 45274-0789

George S. May International Co.  
303 S. Northwest Hwy.  
Park Ridge, IL 60068

Harris Bank  
Bankruptcy Department  
150 West Wilson  
Palatine, IL 60067

Innovative Bank  
SOHO Loans  
360 14th Street  
Oakland, CA 94612

J P Morgan Chase Bank  
712 Mail St. 4th Floor N.  
Attn: Bankruptcy Dept.  
Houston, TX 77002

National City  
P.O. Box 3038  
Kalamazoo, MI 49003-3038

Popular Leasing USA  
3000 Dundee Rd Ste 301  
Northbrook, IL 60062

Washington Mutual  
1301 Second Ave.  
Seattle, WA 98101

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	)	Chapter 11
Cecilia N. Johnson	)	Case No. 09-37011
	)	
Debtor and Debtor in Possession	)	Hearing: February 23, 2010 at 10:00 a.m.

**NOTICE OF MOTION TO CONTINUE HEARING OF DEBTOR'S MOTION TO  
EXTEND THE DEADLINE TO FILE OBJECTIONS TO PROOFS OF CLAIMS**

NOW COMES the Debtors and Debtors in Possession, My Ranch, Inc. ("My Ranch") and Cecelia N. Johnson ("Johnson"), by and through their attorneys, Forrest L. Ingram, P.C., and moves this Honorable Court for a Continuance to the Hearing on Debtor's Extension of Time to File Objections to Proofs of Claim. In support thereof, the Debtor states as follows:

1. My Ranch filed its Chapter 11 bankruptcy case on September 25, 2009.
2. Johnson filed her chapter 11 bankruptcy case on October 5, 2009.
3. On January 5, 2010, this Court entered an order granting My Ranch and Johnson's joint motions for Joint Administration in the lead case 09-35697.
4. This Court set January 29, 2010 as the last day to file objections to proofs of claim
5. The majority of proofs of claim filed with the Court in My Ranch's bankruptcy case involve claims which arise from leases entered into by My Ranch. Johnson acted as a personal guarantor on most, if not all, of those leases.
6. On January 29, 2009, this Court entered sixteen orders rejecting leases entered into by the Debtor prior to its filing for bankruptcy. Prior to the entry of these orders, the Debtor had

entered into settlement negotiations with the leaseholders in an attempt to resolve control of various pieces of equipment, and the claims of each creditor.

7. On February 9, 2010, the Debtors filed with a motion to extend the deadline to file objections to proofs of claim to be heard on February 16, 2010. The Debtor believes that insufficient notice was given for this motion, and the Debtor would like to reset that matter for February 23, 2010.

8. The Debtor believes notice given on this motion shall be sufficient to correct the deficient notice on the original motion to extend the deadline to object to proofs of claim.

WHEREFORE, the Debtors, My Ranch, Inc. and Cecelia N. Johnson respectfully requests that this Honorable Court continue Debtors' motion to extend the deadline for Debtor to file objections to proofs of claim to February 23, 2010, and grant the Debtor such other and further relief as this Court deems just and equitable.

Respectfully submitted,

MY RANCH, INC. and  
CECELIA N. JOHNSON

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By: /s/ Forrest L. Ingram  
One of its attorneys

Forrest L. Ingram #3129032  
Philip Groben  
Vic Chaudhry  
Michael Ohlman  
Forrest L. Ingram P.C.  
79 West Monroe, Suite 900  
Chicago, Illinois 60603  
(312) 759-2838